

LATHAM & WATKINS LLP
Steven M. Bauer (Bar No. 135067)
steven.bauer@lw.com
Margaret A. Tough (Bar No. 218056)
margaret.tough@lw.com
Robert E. Sims (Bar No. 116680)
bob.sims@lw.com
505 Montgomery Street, Suite 2000
San Francisco, California 94111-6538
Telephone: +1.415.391.0600
Facsimile: +1.415.395.8095

LATHAM & WATKINS LLP
Melissa Arbus Sherry (*pro hac vice*)
melissa.sherry@lw.com
555 11th Street, NW, Suite 1000
Washington, DC 20004-1304
Telephone: +1.202.637.2200
Facsimile: +1.202.637.2201

CLARENCE DYER & COHEN LLP
Kate Dyer (Bar No. 171891)
kdyer@clarencedyer.com
899 Ellis Street
San Francisco, California 94109-7807
Telephone: +1.415.749.1800
Facsimile: +1.415.749.1694

Attorneys for Defendant
PACIFIC GAS AND ELECTRIC COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

CASE NO. CR-14-00175-TEH

**JOINT APPLICATION FOR PROTECTIVE
ORDER REGARDING EMPLOYEE
INFORMATION; ~~PROPOSED~~ ORDER**

Judge: Hon. Thelton Henderson

APPLICATION

The parties jointly submit this application for a Protective Order regarding the disclosure to the government of certain confidential and personal identifying information regarding PG&E employees. The parties agree and request that the Court order that:

1. These materials may be viewed only by individuals from the United States Attorney's Office and agents/investigators assigned to prosecute the case;
2. These materials may be used only in connection with this criminal case;
3. In the event that either party finds it necessary to file copies of these materials, the parties agree and request that this Court order such filing be made under seal; and
4. If any party seeks to admit these materials at trial, confidential and personal identifying information will be redacted.

SO STIPULATED.

Dated: July 13, 2016

By /s/

Steven M. Bauer
Margaret A. Tough
Robert E. Sims
LATHAM & WATKINS LLP

Kate Dyer
CLARENCE, DYER & COHEN LLP

*Attorneys for Defendant
Pacific Gas and Electric Company*

Dated: July 13, 2016

By BRIAN J. STRETCH
United States Attorney
/s/
Hallie M. Hoffman
Hartley M. K. West
Jeffrey B. Schenk
Assistant United States Attorneys

SIGNATURE ATTESTATION

I declare that concurrence has been obtained from each of the above signatories to file this document with the Court.


/s/
Margaret A. Tough

~~PROPOSED~~ ORDER

Based upon the above application, and for good cause appearing, IT IS HEREBY ORDERED that the disclosure of certain confidential and personal identifying information regarding PG&E employees, shall be governed by this Protective Order. IT IS FURTHER ORDERED that these materials may be viewed only by individuals from the United States Attorney's Office and agents/investigators assigned to prosecute the case. IT IS FURTHER ORDERED that these materials may only be used in connection with this criminal case. IT IS FURTHER ORDERED that in the event that either party finds it necessary to file copies of these materials, such filing shall be made under seal and IT IS FURTHER ORDERED that if either party seeks to introduce any of these materials at trial, confidential and personal identifying information shall be redacted.

IT IS SO ORDERED.

Dated: July 14 2016


HON. THELTON E. HENDERSON
United States District Judge